



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CRH/JMH/EHS  
F. #2017R00906

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 10, 2022

By Email and USAfx

Paul A. Goldberger  
Renee Melinda Wong  
c/o Goldberger & Dubin PC  
401 Broadway, Suite 306  
New York, New York 10013

Re: United States v. Congying Zheng  
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
Department of Homeland Security Records regarding international travel	CZ-004984	CZ-005019
Recording of interview	CZ-005999	CZ-005999
Department of State Records	CZ-005020	CZ-005223
TD Bank records	CZ-005224	CZ-005610
Navy Federal Credit Union records	CZ-005611	CZ-005842
Department of Homeland Security Records	CZ-005843	CZ-005845
Copies of Interpol Red Notices	CZ-005846	CZ-005858

<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>
Handwritten notes	CZ-005859	CZ-005860
New York Department of State records	CZ-005861	CZ-005973
New York Department of State records	CZ-005974	CZ-005988
Audio recording	CZ-005989	CZ-005989
Reports associated with data from search warrant No. 20-MC-2113	CZ-005990	CZ-005990
Apple records	CZ-005991	CZ-005991
AT&T records	CZ-005992	CZ-005992
Paypal records	CZ-005993	CZ-005993
T-Mobile records	CZ-005994	CZ-005994
T-Mobile records	CZ-005995	CZ-005995
T-Mobile records	CZ-005996	CZ-005996
Yahoo, Inc. records	CZ-005997	CZ-005997
Yahoo, Inc. records	CZ-005998	CZ-005998

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers the materials marked produced today that have been marked “SENSITIVE” to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Craig R. Heeren  
Craig R. Heeren  
J. Matthew Haggans  
Ellen H. Sise  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)